

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

**ARCHITECTURAL BUSSTRUT  
CORPORATION d/b/a busSTRUT**

*Plaintiff,*

**v.**

**TARGET CORPORATION**

*Defendant.*

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Case No. 0:19-cv-00968-DSD-ECW

Judge David S. Doty

Magistrate Judge Elizabeth Cowan Wright

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**PLAINTIFF’S MOTION FOR LEAVE TO FILE A REPLY MEMORANDUM IN  
SUPPORT OF PLAINTIFF’S MOTION FOR LEAVE TO FILE A FIRST  
AMENDED COMPLAINT**

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Pursuant to Local Rule 7-1(b)(3), Architectural busSTRUT Corporation (“busSTRUT”) respectfully asks that the Court grant it leave to file a reply memorandum in support of Plaintiff’s Motion for Leave to File a First Amended Complaint (Dkt. 53) (the “Motion”). In its response to the Motion, Target Corporation (“Target”) offered an incomplete view of relevant caselaw and distorted the factual underpinnings of the Motion. Although busSTRUT is prepared to address these issues at the hearing, busSTRUT believes the Court would be best aided by allowing busSTRUT the opportunity for a more complete response via the reply memorandum sought herein. The proposed reply memorandum is attached as **Exhibit A**.

Date: January 27, 2021

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF COMPLIANCE**

I certify that the Motion complies with Local Rules 7.1(f) and 7.1(h). In the preparation of this reply memorandum, I used Microsoft Word Version 2016 and this word processing program has been applied specifically to include all text, including headings, footnotes, and quotations. I certify that this Motion contains 191 words, excluding the caption designation, the signature block text, and this certificate of compliance.

/s/ Jeremy A. Fielding

Jeremy A. Fielding

**MEET-AND-CONFER STATEMENT**

Counsel for busSTRUT met and conferred with counsel for Target on January 26, 2021 in an effort to seek agreement concerning the issues raised in this Motion. Counsel for Target refused to consent to busSTRUT's desired reply.

/s/ Jeremy A. Fielding

Jeremy A. Fielding

**CERTIFICATE OF SERVICE**

I certify that on January 27, 2021, a true and correct copy of the foregoing was served on all counsel of record via this Court's ECF filing system.

/s/ Jeremy A. Fielding

Jeremy A. Fielding